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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DAWEN LI,

Plaintiff,

V.

ALEJANDRO MAYORKAS, Secretary, United States Department of Homeland Security, *et al.*,

Defendants.

C 4:24-cv-04711-JST

**STIPULATION TO STAY PROCEEDINGS;
[PROPOSED] ORDER**

The parties, through their undersigned attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until August 21, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

1. Plaintiff filed this mandamus action seeking adjudication of his Form I-589, Application for Asylum and for Withholding of Removal. United States Citizenship and Immigration Services (“USCIS”) has scheduled the asylum interview to take place on April 23, 2025. USCIS agrees to work diligently towards completing adjudication of Plaintiff’s application, absent the need for further adjudicative action or unforeseen circumstances that would require additional time for adjudication.

1 2. Plaintiff agrees to submit all supplemental documents and evidence no later than seven to
 2 ten days prior to the interview, pursuant to USCIS policy. Plaintiff agrees that the failure to timely
 3 submit this evidence may result in the rescheduling of the interview at no fault of USCIS.

4 3. If needed by Plaintiff or his dependent(s), Plaintiff shall bring his own interpreter to his
 5 asylum interview. *See https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-*
 6 *provide-interpreters-starting-sept-13.* Plaintiff recognizes that failure to bring an interpreter to his
 7 interview may result in the interview being rescheduled at no fault of USCIS.

8 4. Upon receipt of USCIS' decision, Plaintiff agrees to voluntarily dismiss this case.

9 5. The parties agree to bear their own attorney fees and costs.

10 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until
 11 August 21, 2025, at which time the parties will file a joint status report with the Court. At that time, the
 12 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if
 13 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this
 14 case will benefit the parties and conserve the Court's resources while the parties pursue a potential
 15 administrative resolution.

18 Dated: January 2, 2025

Respectfully submitted¹,

19 ISMAIL J. RAMSEY
 20 United States Attorney

21 _____
 22 /s/ Elizabeth D. Kurlan
 23 ELIZABETH D. KURLAN
 24 Assistant United States Attorney
 25 Attorneys for Defendants

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¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed below concur in the filing of this document.

1 Dated: January 2, 2025

2 */s/ David W. Ewing*
3 DAVID W. EWING
Law Office of David Ewing
Attorney for Plaintiff

4 **{PROPOSED} ORDER**

5 Pursuant to stipulation, IT IS SO ORDERED.

8 Date: January 3, 2025

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10 HON. JON S. TIGAR
United States District Judge